



U.S. Department of Justice

United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza*

November 14, 2014

**BY ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: **United States v. Rudy Kurniawan**, 12 Cr. 376 (RMB)

Dear Judge Berman:

The Government writes with a status update on the on-going forfeiture proceedings in the above-captioned case and to request a two-week extension of the time in which to submit a proposed schedule for further discovery and ancillary proceedings, if any such proceeding is necessary. Since the Government's letter of October 28, 2014, the Government has engaged in discussions with claimant Acker Merrall & Condit ("AMC") and potential claimant Pacific Wine Distributors ("PWD") regarding a potential disposition of their claims on certain assets subject to the Court's Preliminary Order of Forfeiture dated August 5, 2014 (the "Assets"). Those discussions are on-going, and the parties request two weeks to continue those discussions. By November 28, 2014, the parties will submit a proposed schedule for conducting any necessary ancillary proceedings in the event that the claims are not resolved.

The Government has spoken with counsel for AMC regarding the potential claim by PWD, and neither the Government nor AMC object to an extension of time through November 28, 2014, for PWD to file any claim that it may wish to assert as to the Assets.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By:

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